

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.: _____
v.	:	DATE FILED: _____
GENE J. RODIO	:	VIOLATION: 18 U.S.C. §1347
TROY A. MCDONALD		(Health care fraud
DANYELLE D. ROCKMORE-BEY	:	- 2 Counts)
JASON R. BERGHORN		

INFORMATION

COUNT 1

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this Information:

Background

1. Independence Blue Cross was a health care benefit program, within the meaning of 18 U.S.C. § 24(b), which provided private plans and contracts, affecting commerce, under which medical benefits, items and services were paid for and provided to individuals.

2. Defendant GENE J. RODIO was employed by Independence Blue Cross as an accounts payable refund analyst, in an office located at 2615 S. 10th Street, Philadelphia, Pennsylvania 19148.

3. Defendant JASON R. BERGHORN subscribed to an Independence Blue Cross plan, under subscriber number 593581841.

4. Defendant DANYELLE D. ROCKMORE-BEY was married to an individual who subscribed to an Independence Blue Cross plan, under subscriber number

9425652.

5. Defendant TROY A. MCDONALD had been friends with defendants GENE J. RODIO and DANYELLE D. ROCKMORE-BEY for over ten years, and more recently had become acquainted with defendant JASON R. BERGHORN.

The Scheme to Defraud Independence Blue Cross

6. Defendants GENE J. RODIO and TROY A. MCDONALD agreed that:

(a) MCDONALD would provide RODIO with the names and subscriber numbers of Independence Blue Cross subscribers; and

(b) RODIO would use this information to create and submit false and fraudulent Independence Blue Cross paperwork authorizing payments to those subscribers.

7. Defendant DANYELLE D. ROCKMORE-BEY provided defendant TROY A. MCDONALD with her estranged husband's Independence Blue Cross subscriber number, knowing that MCDONALD would forward the subscriber number to defendant GENE J. RODIO and that RODIO would use the subscriber number to create false and fraudulent Independence Blue Cross paperwork.

8. Defendant JASON R. BERGHORN provided his Independence Blue Cross subscriber number to defendant TROY A. MCDONALD, knowing that MCDONALD would forward the subscriber number to defendant GENE J. RODIO and that RODIO would use the subscriber number to create false and fraudulent Independence Blue Cross paperwork.

9. Defendant GENE J. RODIO used the information provided by defendants JASON R. BERGHORN and DANYELLE D. ROCKMORE-BEY to create and submit false and fraudulent Independence Blue Cross check authorization paperwork. As a result, from on or

about March 4, 2002, until on or about June 21, 2002, RODIO fraudulently obtained a total of 53 checks issued by Independence Blue Cross, which totaled \$261,740.53.

10. On or about March 22, 2002, at Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendants

GENE J. RODIO
TROY A. MCDONALD
DANYELLE D. ROCKMORE-BEY

knowingly and willfully executed the above scheme to defraud a health care benefit program, that is Independence Blue Cross, and to obtain money and property owned by and under the custody and control of Independence Blue Cross, by means of false and fraudulent pretenses, representations, and promises, in connection with the delivery of and payment for health care benefits, items and services, by knowingly submitting and causing to be submitted a false and fraudulent Independence Blue Cross check authorization document authorizing payment of \$4,950.15 to Independence Blue Cross subscriber number 9425652.

All in violation of Title 18, United States Code, Section 1347.

COUNT 2

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

11. Paragraphs 1 through 9 are realleged herein.

12. On or about April 8, 2002, at Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendants

GENE J. RODIO
TROY A. MCDONALD
JASON R. BERGHORN

knowingly and willfully executed the above scheme to defraud a health care benefit program, that is Independence Blue Cross, and to obtain money and property owned by and under the custody and control of Independence Blue Cross, by means of false and fraudulent pretenses, representations, and promises, in connection with the delivery of and payment for health care benefits, items and services, by knowingly submitting and causing to be submitted a false and fraudulent Independence Blue Cross check authorization document authorizing payment of \$4,998.06 to Independence Blue Cross subscriber number 593581841.

In violation of Title 18, United States Code, Section 1347.

PATRICK L. MEEHAN
UNITED STATES ATTORNEY